



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

# MEMO ENDORSED

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 30, 2020

**BY ECF AND E-MAIL**

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
New York, New York 10007

**Re:     *United States v. Robert Bell, 16 Cr. 210 (KPF)***

Dear Judge Failla:

A VOSR hearing is presently scheduled for August 14, 2020 at 10:00 a.m. in the above-captioned case. Yesterday, the Government learned that there has not been any progress in the defendant's case in Westchester County, which forms the basis of the instant VOSR specification, and that the Westchester matter has been adjourned indefinitely due to the COVID pandemic. Accordingly, the Government respectfully requests a 90-day adjournment of the defendant's VOSR hearing to track the progress of the defendant's state case. I have conferred with Daniel Hochheiser, counsel for the defendant, who consents to this request.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: /s/ Rebecca T. Dell

Rebecca T. Dell  
Jonathan E. Rebeld  
Assistant United States Attorney  
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cc:     Daniel Hochheiser, Esq. (via ECF)  
Probation Officer Erica Cudina, U.S. Department of Probation (via e-mail)

Application GRANTED. Mr. Bell's VOSR hearing, previously scheduled for August 14, 2020, is hereby ADJOURNED to **October 30, 2020, at 2:00 p.m.** in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY.

SO ORDERED.

Dated: July 30, 2020  
New York, New York

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE